

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Application of CHEVRON

10 MC 00001 (LAK)

This Document Applies to: ALL CASES
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**NOTICE OF MOTION, OR IN THE ALTERNATIVE,
NOTICE OF JOINDER IN RELATED MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated August 19, 2010, the accompanying Declaration of Paul E. Dans, dated August 19, 2010, and all prior papers and proceedings had here, Rodrigo Pérez Pallares will move this Court, before the Honorable Lewis A. Kaplan, on a date to be determined by this Court, respectfully requested to be as soon as the Court's schedule permits, for an order compelling compliance with subpoenas, or in the alternative, granting Chevron's Motion for A Preservation Order and to Supplement and Enforce the Subpoenas (D.E. 2), a motion in which he joins and responds to Respondents' Motion for Leave to File Further Opposition to Chevron's Motion.

Dated: August 19, 2010
Miami, Florida

RIVERO MESTRE & CASTRO

By: /s/ Paul E. Dans

Paul E. Dans

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*Admitted *pro hac vice*